

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Northern District of Texas

CLERK OF DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2019 JAN 22 PM 3:35

United States of America
v.
Christopher James Regan

DEPUTY CLERK

Case No.

1 - 19 MJ - 0001

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 19-22, 2018 in the county of Howard County in the
Northern District of Texas, the defendant(s) violated:

Code Section
18 USC 2252 (a)(2)

Offense Description
Receipt and Distribution of Child Pornography

This criminal complaint is based on these facts:

See attached affidavit

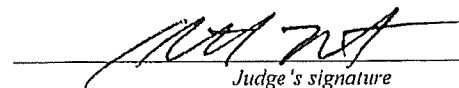
☒ Continued on the attached sheet.


Complainant's signature

Marisol O'leary, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 01/22/2019


Judge's signature

City and state: San Angelo, TX

E. Scott Frost, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Marisol O'Leary, being first duly sworn, depose and state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I have been a federal criminal investigator since 2003 and I am currently employed by the U.S. Department of Homeland Security, Homeland Security Investigations (HSI) in San Angelo, Texas. I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. My duties as a Criminal Investigator include, but are not limited to, investigating federal statutes consisting of cybercrimes, alien smuggling and smuggling of contraband into and out of the United States, as well as general alien investigations. As part of my duties, I have also conducted and participated in investigations relating to the sexual exploitation of children. During the course of these investigations, I have observed and reviewed examples of child pornography in various forms of media, including computer media. As part of my duties and responsibilities as an HSI Special Agent, I am authorized to investigate crimes involving the sexual exploitation of children pursuant to Title 18, United States Code, Sections 1466A, and 2251, *et seq.*

3. As part of my duties as an HSI Special Agent, I have received training and gained extensive experience in the conduct of criminal investigations involving child exploitation and child pornography.

4. The facts set forth in this affidavit are known to me as a result of my participation in this investigation and speaking with other law enforcement officials, personnel, and witnesses. I have spoken to, and worked with, other experienced federal, state, and local agents and peace officers in investigating this case.

5. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

II. PURPOSE OF AFFIDAVIT

6. This affidavit is provided in support of an application for an arrest warrant.

7. I have probable cause to believe Christopher Regan and Tanya Regan violated 18 U.S.C. § 2252(a)(2), that is, receipt of images of child pornography. Title 18, United States Code, Section 2252(a)(2), make it a federal crime for any person to knowingly mail, transport, ship, receive, or distribute, using any means or facility of interstate or foreign commerce, or in interstate or foreign commerce, by any means, including by computer, any material constituting or containing images of child pornography.

8. I have probable cause to believe Tanya Marie Regan violated 18 U.S.C. § 2251(b), that is, production of child pornography by a parent or guardian. Title 18, United States Code, Section 2251(b) makes it a federal crime for any parent or legal guardian to knowingly permit such minor to engage in sexually explicit conduct for the

purpose of producing any visual depiction of such conduct if the parent or legal guardian knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

III. PROBABLE CAUSE

9. On or about November 6, 2018, deputies with the Howard County Sheriff's department contacted HSI special agents in San Angelo regarding a NCMEC referral. Specifically, the Howard County deputies informed HSI of three images of child pornography, which had been stored on a google account linked to IP address: 74.195.103.48 and IP address 74.197.212.233. Howard County deputies issued a summons for subscriber information for the above-referenced IP addresses. Results yielded information that the IP addresses were assigned to account holder Christopher Regan, at 1516 Tucson, Big Spring, Texas, with a telephone number of (214) 304-1426. The occupants of the above-referenced residence, as identified through open source records, were identified to be Christopher Regan and Tanya Marie Regan. In addition to Tanya and Christopher Regan, who are married, three minor children also reside at the residence. Further investigation revealed that telephone number (214) 304-1426 is a cellular phone number registered to Christopher Regan.

10. The google account associated with the above-referenced IP addresses was identified as jennalennon12@gmail.com. Law enforcement obtained a federal search

warrant to Google, Inc. Google complied with the search warrant and noted that the phone number attributed to the jennalennon12@gmail.com email account is (214) 304-1426 – Christopher Regan’s cellular number. Law enforcement were also able to identify at least 37 other email accounts associated with Christopher Regan’s cellular number.

11. Google records confirm that the three images of child pornography were uploaded from the IP address belonging to Christopher Regan on or about September 19, 2018 through September 22, 2018. The images were then emailed to Tanya Regan.

12. The three images are described as follows:

- Image 1: a prepubescent female child wearing a blue in color dress with no underwear, laying on her back with her legs spread open exposing her vagina;
- Image 2: a prepubescent female child wearing what appears to be a bathing suit while someone is pulling the bathing suit to the side exposing the young child’s nude vagina;
- Image 3: a prepubescent female child with her legs spread open inserting the index finger of her hand in her vagina and holding the labia open exposing her vagina and anus while the image is being captured.

13. On November 8, 2018, Howard County deputies secured a state search warrant for the above-referenced residence. On November 9, 2018, local law enforcement, with the assistance of HSI special agents, executed the search warrant at the residence of Christopher Regan and Tanya Regan to obtain evidence of child pornography. Law

enforcement seized multiple digital devices, including a Toshiba laptop that belonged to Tanya Marie Regan.

14. On November 9, 2018, I interviewed Tanya Regan. During the interview, she admitted to the aggravated sexual assault and exploitation of her 12-year-old child. Specifically, Tanya Regan admitted to having vaginal and oral sex with her 12-year-old son on at least one occasion between the dates of February 2018 to April 2018. Tanya Regan stated she used a camera to video record the sexual encounter and then uploaded the video to her Toshiba laptop. Tanya Regan stated that she spoke with her husband, Christopher Regan, about her plan to have sex with her 12-year-old son to help him with his anger issues. Tanya Regan stated her husband was out of town when it happened but stated she advised him when she had completed the sex act. Tanya Regan also admitted to using a social media application known as Tumblr. Tanya Regan further advised that her Tumblr username was hotmom0984.

15. Tanya Regan later admitted to the possession and receipt of child pornography, specifically the receipt of what she claims is a 13-year-old girl and her 15-year-old brother in a sexually explicit image, which she stated she received on November 8, 2018, from a person in her phone contacts, listed as "Diane." An image of two underage children, fitting the description Tanya Regan gave to law enforcement was discovered within her Tumblr chats. Specifically, law enforcement found an image that appears to be of two naked underage children with the minor female holding the boy's erect penis.

16. During an interview with law enforcement, Christopher Regan also admitted to maintaining and using a Tumblr account. He admitted to using the Tumblr account to contact other users and meet up with them to have sexual encounters while others watched or while he watched his wife have sex with strangers. He denied, however, possessing or downloading child pornography.

17. On November 26, 2018, HSI Agents received information from a co-worker of Christopher Regan. The coworker informed law enforcement that Christopher Regan had a Tumblr account linked to Christopher Regan's work email account, cregan@elfsfreight.com. Information received indicated Christopher Regan had been communicating with other Tumblr users using the Tumblr username: "differentdocforyou." The information received indicated that Christopher Regan was communicating on Tumblr with his wife, Tanya Regan. During these communications, Christopher Regan was using Tumblr username "differentdocforyou," and his wife was using Tumblr username "hotmom0984." Christopher and Tanya Regan were discussing the sexual abuse and sexual encounters with their minor children.

18. On December 6, 2019, law enforcement applied for and secured a federal search warrant for Tumblr accounts associated with cregan@elfsfreight.com and Tumblr user names: hotmom0984 and differentdocforyou. On or about January 10, 2019, law enforcement received the return from Tumblr on the accounts. Review of the hotmom0984 account showed ownership to be linked to Tanya Regan and the differentdocforyou account was linked to Christopher Regan's email:

cregan@elfsfreight.com, verifying that the conversation captured by the co-worker on the iPad was in fact Christopher Regan.

19. On November 28, 2018, I reviewed several Tumblr messages, which had been captured by screen shot on an iPad belonging to the co-worker. I observed screen shots of a user profile page showing an image of a muscular man with a medical emblem set as the background, with a title "Just a normal guy" Medical Doctor in Texas. The username for the Tumblr account appeared to be "differentdocforyou," and the login information indicates the email associated with the account is "cregan@elfsfreight.com." The messages I reviewed include messages between "differentdocforyou" and "hotmom0984." Some of the messages are reproduced below as originally written – typographical and grammatical errors in the original text have not been changed or altered for this affidavit. Messages between the two include, but are not limited to, the following:

differentdocforyou: So based on ur page take it ur easy slut huh

differentdocforyou: Does ur son know mom is easy fuck slut

hotmom0984: Idk tbh..he walks around calling me a ho and a hooker

differentdocforyou: Can I tell u why? He is attracted to that, he probably says it thinking it make u made or when he is mad right

hotmom0984: Yes but calls my 9 yr old that too

differentdocforyou: Ya sorry talk to diana but your going to have to dom him then train him to do same he is getting off on that

hotmom0984: Ok np (no problem)

differentdocforyou: Js ur gonna have to take control now diana son brings friends home to do his mom she is like his mom/gf hers gets off watching n making her do things for him with meds (325)268-2208. Dr James Kline u can text him just talked to him doesn't have a tumb

hotmom0984: Nice and ok

differentdocforyou: Ya I am assuming you're a minor dick lover too

hotmom0984: Yes bad but I take and clean ddf

differentdocforyou: Nice

hotmom0984: Ya

differentdocforyou: Not huge (sends an erect penis picture)

(Conversation continues)

differentdocforyou: Js but I am a sure you have seen other doctors for your son your gonna have to follow strict orders or this never work and 3 years from now still be dealing with same (the conversation continues on grooming the minor child by spending time with him alone in her room, watching TV, etc)

differentdocforyou: Js with in 3 to 5 days you need to start working on his dick again. The boys on this page of mine, it has worked for them and 100s others when there mom does as I instruct or when I say

hotmom0984: Ok

differentdocforyou: And don't tell him to shave if that's ur thing n he has hair, don't freak if he pre cums in ur mouth or on u. All that is a turnoff for younger

hotmom0984: He taking shower now then we be in my room for a while...ya ik and he does shave bc we all shave lol

differentdocforyou: Ok js when u suck it like u would any random domt like pick on pim0ples, say anything negative etc sorry but seen moms do thos things then tell me son don't like well no crap

hotmom0984: Nope I don't do that.. I just suck it lol

differentdocforyou: K js wish u had cameras like diana did. I would watch her sons face to read what he was thinking then next time I tell her do it this way and before long he was telling her what to do

(they discuss whether they will tell dad or not that she will be having sex with her son, Tanya tells him that he is willing to do what ever and tells him that her husband is waiting on his call)

differentdocforyou: Ok so are you willing once u get him to that point to be ur sons fuck toy basically n give when ever he wants or says

hotmom0984: Yes

(conversation continues about how the son will feel like his mom is his girlfriend and he will treat and expect things a girlfriend would do.)

differentdocforyou: Well not now but has he improves u will award correct
(they continue to talk about continuing the sexual activity and if he [the son] is not changed by his birthday, he will need to go to a long term facility, they talk about later introducing him to threesomes.)

differentdocforyou: Good so ur man Seems like u fucking son js lok

hotmom0984: Ya he does lol

differentdocforyou: Beyond it fixing him u like him doing u

hotmom0984: Ya

differentdocforyou: so ur man said u have older son with issues

hotmom0984: Ya he 17

differentdocforyou: No fuck u ja (just asking)

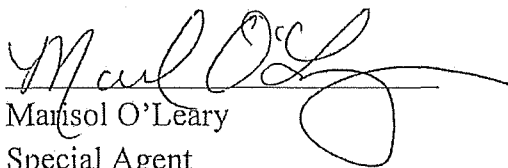
hotmom0984: Not since he was 13

20. On or about November 27, 2018, law enforcement performed a forensic examination on the Toshiba laptop seized during the search of Tanya and Christopher

Regan's residence. Law enforcement found multiple videos of Tanya Regan having vaginal and oral sex with what appears to be a minor child. During Tanya Regan's interview, she admitted to having vaginal and oral sex with her minor son on at least occasion between the dates of February 2018 to April 2018.

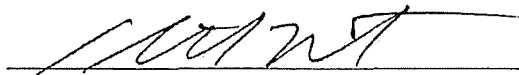
Further affiant sayeth not.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marisol O'Leary", written over a horizontal line.

Marisol O'Leary
Special Agent
Homeland Security Investigations
San Angelo, TX

Subscribed and sworn to before me on this ____ day of January 22, 2019

A handwritten signature in black ink, appearing to read "E. Scott Frost", written over a horizontal line.

E. SCOTT FROST
UNITED STATES MAGISTRATE JUDGE